

#### Soil/Concrete Boring Locations

- No Exceedance
- Sample Exceedance <2 ft bgs
- Sample Exceedance >2 and < 4 ft bgs
- Sample Exceedance >4 ft bgs

Results are posted only for locations that have one or more exceedances.

- Property Boundary
- Former Press
- Press Pit
- Unidentified Feature
- Surveyed Feature
- Fence

Boring Location	Sample Depth (ft bgs)	Field Test Kit Concentration (ppm)	Analytical Lab - Total PCBs (ppm)
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Note: red bolded entries indicate that concentrations either exceed 25 ppm in the upper 1 foot of soil or exceed 100 ppm below 1 foot. Where two results are present for the same depth interval at a location, the second result represents a field duplicate.

Where the depth interval is "0", it represents concrete dust during starbit drilling or a concrete sample.

"--" Sample was not submitted for laboratory analysis.

"<" Denotes that Total PCBs were not detected at the posted value.

Data validation flags are included in Tables 6 and 7.

#### Map Projection:

State Plane Feet, Colorado Central Zone, NAD83.

Aerial Photo Basemap Source:

Google Earth, 10/6/2013 and

Copyright 2013 Esri, DeLorme, NAVTEQ, TomTom.

30 0 30

Feet

1 inch = 30 feet



**URS**

#### Figure 7 STAGE I PCB RESULTS IN SOIL AND CONCRETE - MARCH 2014

MOLINE STREET PCB SITE  
AURORA, COLORADO

PROJECT NO.  
41569671

DRAWING NO.  
Fig7\_PCB\_ImpactConcrSoil.mxd

DATE  
4/28/14

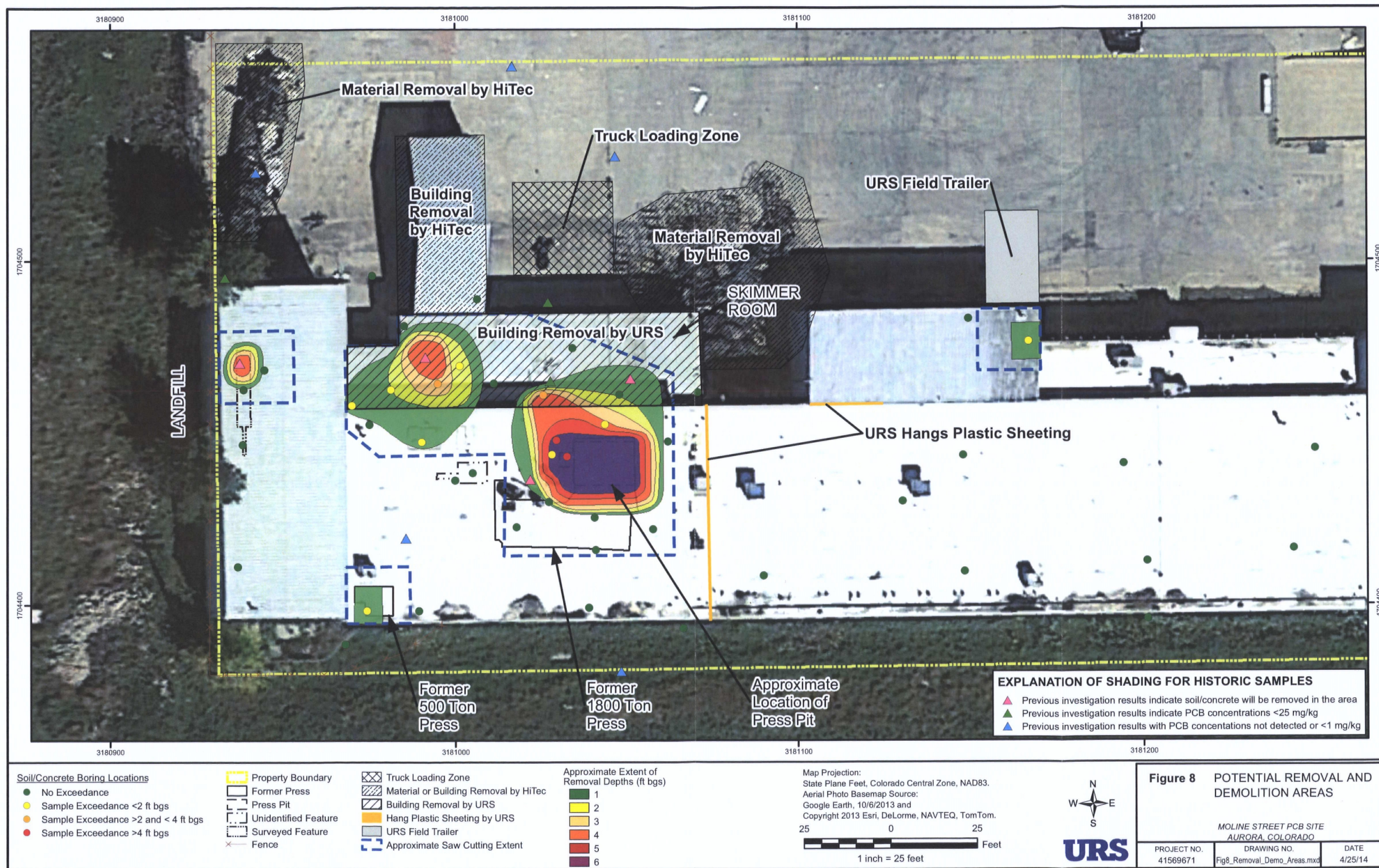
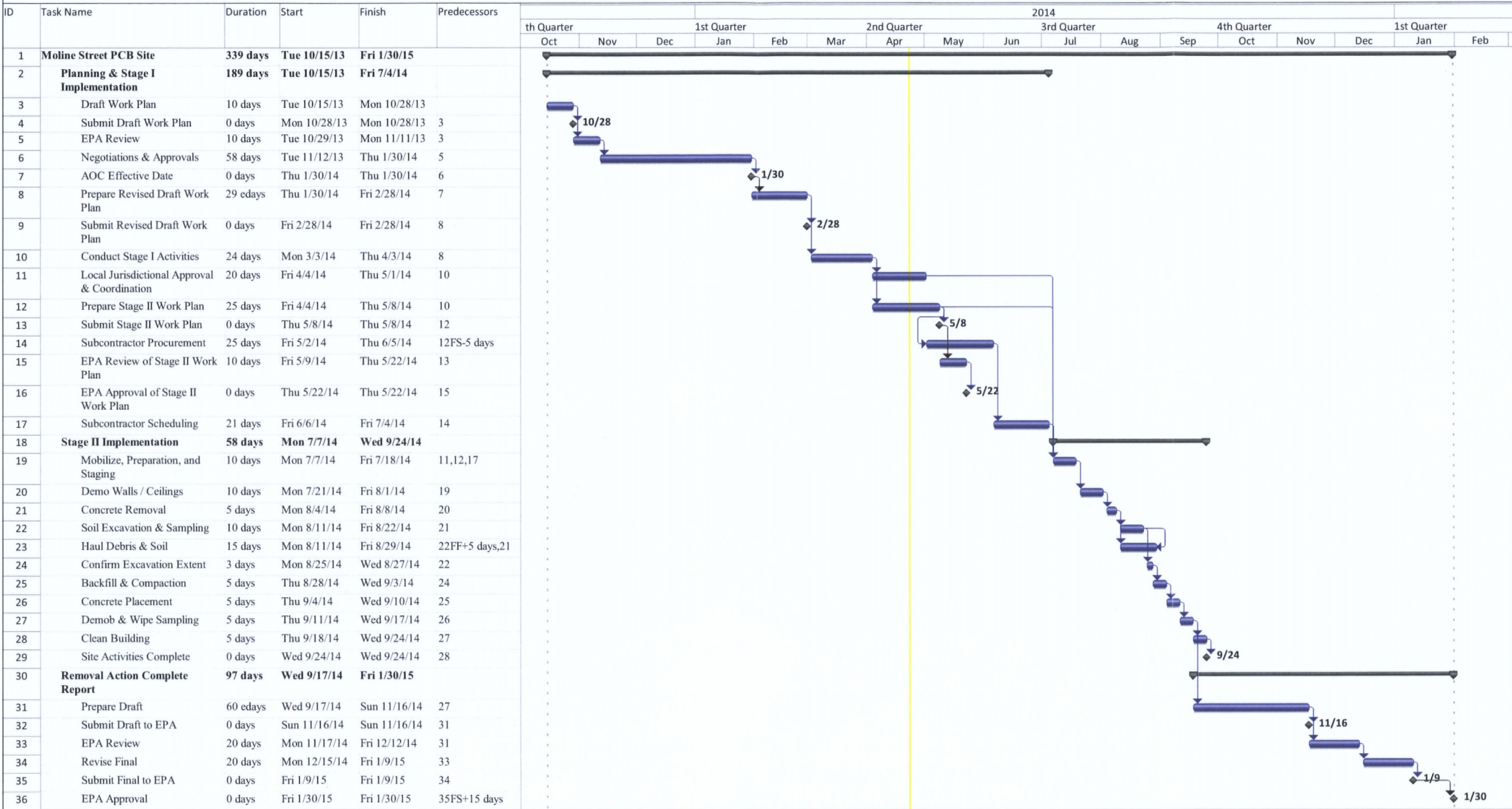


Figure 9 - Project Schedule  
Moline Street PCB Site



Project: Moline Street PCB Site  
Date: Wed 4/23/14

Task

Split

Milestone

Summary

Project Summary

External Tasks

External Milestone

Deadline

Progress

**ATTACHMENT A**  
**ASBESTOS BUILDING INSPECTION REPORT – 2/24/2014**



**HERRON™** Enterprises USA, Inc.

Hazardous Materials\* Mold\* Asbestos\* Lead Paint  
Environmental Services\* Industrial Hygienists

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February 28, 2014

URS Corporation / Ms. Sarah Lave

**HERRON™ Project No.: 0104148**

**Job No.: Verbal**

**Location: Buildings B, C, D, E, F, G, H, and I, 3555 Moline St., Aurora, CO 80010**

**Dates of Service: February 24-28, 2014**

**Services Requested: Environmental Consultation/Asbestos Services**

### *Scope of Work*

Per your request, and under the guidelines defined, HERRON™ Enterprises USA, Inc. (HERRON™) has concluded the Environmental Consultation at the aforementioned property.

HERRON™ was contracted by the Client to perform:

1. **Comprehensive Asbestos Building Inspection Buildings B, C, and F**
  - a. Comprehensive Asbestos Building Inspection prior to a demolition
2. **Limited Asbestos Building Inspection Buildings (Floors only) Buildings D, E, G, H, and I**
  - a. Limited Asbestos Building Inspection prior to a renovation (concrete slab removal only)
    - i. It was expressly advised that although this is a Limited Asbestos Building Inspection, it is comprehensive to the aforementioned materials. Only materials impacted requiring response actions have been instructed and authorized by the Client. Under the protocol of limited sampling whereas not 'all' suspect materials outside of the response action areas were sampled, under local, state and/or federal regulations, including but not limited to AQCC Regulation 8 and OSHA 29 CFR 1926.1101, a certain protocol for sampling, number of samples obtained, and assessment is required.
  - a. Non-destructive bulk sampling;
  - b. 1 Day Turnaround PLM Analyses;

HERRON™ was subsequently contracted by the Client, to perform:

1. Not applicable.



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### *Closure*

Information and data which has been generated as a results of this Environmental Consultation will remain confidential and will not be released to any party without authorization from Client(s) (see authorized distribution).

HERRON™ Enterprises USA, Inc. appreciates the confidence which has been demonstrated by your continued patronage, and look forward to assisting you and your group should you have future needs of Environmental Consultation.

Sincerely,

Billie J. Herron-Lusk  
Project Manager  
HERRON™ Enterprises USA, Inc.

Certified Asbestos Building Inspector(s): Billie J. Herron-Lusk (Project Manager), Michael W. Herron, Sr.

### *Assumptions, and Limitations*

This Environmental Consultation is applicable in whole, not in part, to the entire contents of the document.

HERRON™ and this Environmental Consultation make no representation or assumptions as to past and/or future conditions/occurrences of the specific area(s) inspected.

The results, conclusions and/or recommendations expressed in this Environmental Consultation are based solely on the conditions which were observed at the time of this Environmental Consultation.

HERRON™ inspection incorporated non-destructive sampling techniques and visual inspections in areas which were visible/accessible. Conditions and/or materials which were not inspected and/or commented on may very well differ from those which were inspected and/or commented on.

HERRON™ selected sample locations and frequency of sampling based on observations, your requirements and/or the assumption that like materials in the same area are homogeneous.

**HERRON™ has specifically designed this Environmental Consultation for Client use in the location and identity of Asbestos Containing Material (ACM), and under no circumstances is this Environmental Consultation to be copied, used as a bidding tool and/or used for the development of an Asbestos Abatement Specification document without the express written permission of an executive officer of HERRON™.**

HERRON™ is not responsible/liable for any opinions, conclusions and/or recommendations as provided by others based on any means presented in this Environmental Consultation.

With use of Environmental Consultation, and/or use of any services offered by HERRON™, Client(s) agrees that HERRON™ has been given the authority by the Owner(s) of a property to enter the aforementioned premises, perform the services, utilize any and all floor plans, blue prints, etc., and agrees to indemnify, hold harmless, and defend HERRON™, its Officers, Employees, Assigns, etc. for any and all claims, costs or damages that may result from services contracted, etc.



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### ***Building B Conclusion***

Based on the information generated by this report, we conclude that the aforementioned property **does not contain Asbestos Containing Material(s) (ACM)** for purposes of a **complete demolition by wrecking (recycling prohibited)**.

In order to comply with local, state, and/or federal regulations, the following ACM, or assumed ACM will have to be removed if they will be affected by the demolition:

None detected.

Suspect materials which were sampled and determined to contain  $\leq 1.0\%$  Asbestos (refer to Attachments), by PLM and/or PLM Point Count analysis are:

White Sprayed on Insulation, Surfacing Material (S), Friable, >5000 Square Feet, Good Condition (Current Condition), throughout Interior Ceiling and Walls, 7 Sample(s),

- 022414-1A-B, Ceiling, 25' from N Wall, 10' from E Wall, Photo 083231
- 022414-1B-B, Ceiling, 10' from S Wall, 15' from W Wall, Photo 084922
- 022414-1C-B, Ceiling, 35' from N Wall, 10' from W Wall, Photo 083509
- 022414-1D-B, Ceiling, 15' from S Wall, 5' from W Wall, Photo 084205
- 022414-1E-B, Ceiling, 30' from S Wall, 1' from W Wall, Photo 084510
- 022414-1F-B, E Wall, 20' from N Wall, 6' from Floor, Photo 083728
- 022414-1G-B, S Wall, 20' from E Wall, 5' from Floor, Photo 083748

White Paint on Concrete Walls, Surfacing Material (S), Non-Friable, <5,000 Square Feet, Good Condition (Current Condition), throughout Interior Walls, 5 Sample(s),

- 022414-2A-B, E Wall, 15' from N Wall, 4' from Floor, Photo 092926
- 022414-2B-B, W Wall, 10' from S Wall, 15' from Floor, Photo 085124
- 022414-2C-B, W Wall, 30' from S Wall, 20' from Floor, Photo 092941
- 022414-2D-B, E Wall, 30' from N Wall, 5' from Floor, Photo 084506
- 022414-2E-B, E Wall, 25' from S Wall, 6' from Floor, Photo 092954

White Unfinished Drywall Walls, Miscellaneous Material (S), Non-Friable, <160 Square Feet, Good Condition (Current Condition), throughout Interior Walls, 1 Sample(s),

- 022414-3A-B, E Wall, 15' from N Wall, 4' from Floor, Photo 085453

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

Fiberglass  
Wood  
Glass  
Metal  
Plastic  
Concrete  
Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested.
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.



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3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing >1.0% Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

#### Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive 'destructive' sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or

If extensive 'destructive' sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.
5. Disturbance of these areas could create a potential health hazard.

#### *Recommendations*

The Client has advised that **Building B** is a complete demolition by wrecking (recycling prohibited).

*As Regulated Asbestos Containing Materials were not discovered during this inspection, further action is not required.*

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
2. Asbestos Abatement Project Design (Plan of Action): coordinated with Owner should be developed in order to direct exact areas and quantities of removal for renovation or demolition purposes.



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3. Asbestos Abatement (to facilitate demolition): coordinated with Client, should the material be required to be removed prior to renovation or demolition activity:
4. Asbestos Air Monitoring: of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/dust sampling, etc.
5. Demolition Notification: is required, i.e., prior to demolition (or demolition of a load bearing wall), the Colorado Department of Health and Environment requires that the building(s) be certified by the State Certified Asbestos Building Inspector as:
  - a. not having any regulated asbestos existing anywhere in the building(s);
  - b. this document serves as a certified notification to the owner/operator of the facility and the demolition contractor;
    - i. the non-friable asbestos-containing building materials, i.e., window glazing and caulking, tar impregnated asphaltic roofing materials, floor tiles, mastics, etc. will be allowed to be demolished with the building provided that the proposed building demolition methods do not include explosives, sawing, grinding, abrading or blasting that will render the materials friable;
    - ii. any asbestos-containing material allowed to stay in the facility must remain non-friable during demolition.
  - c. Once the Demolition Notification has been endorsed, the Owner/Contractor is to submit an original to the Colorado Department of Health and Environment, which then undergoes a ten (10) working day notification process, after which a Demolition Approval will be issued, to be posted at the project site during operations.
  - d. After receipt of the CDPHE demolition approval and Building Department demolition permit, renovate or demolish the areas of the Building(s) inspected (recycling prohibited), in accordance with local, state, and/or federal regulations as indicated (only).
  - e. The Owner has been advised of the soil regulations 6 CCR 1007-2, the Colorado Solid Waste Regulations-Asbestos and Asbestos Contaminated Soil. The demolition contractor is required to remove 'all' demolition building material debris from the project site. This would include all 'small' pieces of the structure.



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## *Building C Conclusion*

Based on the information generated by this report, we conclude that the aforementioned property **does not contain Asbestos Containing Material(s) (ACM)** for purposes of a **complete demolition by wrecking (recycling prohibited)**.

In order to comply with local, state, and/or federal regulations, the following ACM, or assumed ACM will have to be removed if they will be affected by the renovation:

None detected.

Suspect materials which were sampled and determined to contain  $\leq 1.0\%$  Asbestos (refer to Attachments), by PLM and/or PLM Point Count analysis are:

Green Paint on Concrete Walls, Surfacing Material (S), Friable, <1000 Square Feet, Good Condition (Current Condition), throughout Interior Walls, 3 Sample(s),

022414-1A-C, S Wall, 3' from W Wall, 2' from Floor, Photo 085501

022414-1B-C, S Wall, 14' from E Wall, 1' from Floor, Photo 085525

022414-1C-C, S Wall, 9' from E Wall, 2' from Floor, Photo 085536

Indeterminate Flooring on Concrete Substrate, Surfacing Material (S), Non-Friable, <160 Square Feet, Good Condition (Current Condition), throughout Interior, 1 Sample(s),

022414-2A-C, On Floor, S Wall, 10' from E Wall, Photo 085544

White Unfinished Drywall Walls, Miscellaneous Material (M), Non-Friable, <160 Square Feet, Good Condition (Current Condition), throughout North Wall, 1 Sample(s),

022414-3A-C, N Wall, 12' from W Wall, 3' from Floor, Photo 085601

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

Fiberglass

Wood

Glass

Metal

Plastic

Concrete

Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested.
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing  $>1.0\%$  Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be



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performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

## Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive ‘destructive’ sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or

If extensive ‘destructive’ sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.
5. Disturbance of these areas could create a potential health hazard.

## *Recommendations*

The Client has advised that **Building C** is a **complete demolition by wrecking (recycling prohibited)**.

*As Regulated Asbestos Containing Materials were not discovered during this inspection, further action is not required.*

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
2. Asbestos Abatement Project Design (Plan of Action): coordinated with Owner should be developed in order to direct exact areas and quantities of removal for renovation or demolition purposes.
3. Asbestos Abatement (to facilitate demolition): coordinated with Client, should the material be required to be removed prior to renovation or demolition activity:
4. Asbestos Air Monitoring: of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/dust sampling, etc.



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5. Demolition Notification: is required, i.e., prior to demolition (or demolition of a load bearing wall), the Colorado Department of Health and Environment requires that the building(s) be certified by the State Certified Asbestos Building Inspector as:
- a. not having any regulated asbestos existing anywhere in the building(s);
  - b. this document serves as a certified notification to the owner/operator of the facility and the demolition contractor;
    - i. the non-friable asbestos-containing building materials, i.e., window glazing and caulking, tar impregnated asphaltic roofing materials, floor tiles, mastics, etc. will be allowed to be demolished with the building provided that the proposed building demolition methods do not include explosives, sawing, grinding, abrading or blasting that will render the materials friable;
    - ii. any asbestos-containing material allowed to stay in the facility must remain non-friable during demolition.
  - c. Once the Demolition Notification has been endorsed, the Owner/Contractor is to submit an original to the Colorado Department of Health and Environment, which then undergoes a ten (10) working day notification process, after which a Demolition Approval will be issued, to be posted at the project site during operations.
  - d. After receipt of the CDPHE demolition approval and Building Department demolition permit, renovate or demolish the areas of the Building(s) inspected (recycling prohibited), in accordance with local, state, and/or federal regulations as indicated (only).
  - e. The Owner has been advised of the soil regulations 6 CCR 1007-2, the Colorado Solid Waste Regulations-Asbestos and Asbestos Contaminated Soil. The demolition contractor is required to remove 'all' demolition building material debris from the project site. This would include all 'small' pieces of the structure.



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### ***Building D Conclusion***

Based on the information generated by this report, we conclude that the aforementioned property **does not contain Asbestos Containing Material(s) (ACM)** for purposes of a renovation.

In order to comply with local, state, and/or federal regulations, the following ACM, or assumed ACM will have to be removed if they will be affected by the renovation:

None detected.

Suspect materials which were sampled and determined to contain  $\leq 1.0\%$  Asbestos (refer to Attachments), by PLM and/or PLM Point Count analysis are:

Not applicable.

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

***Concrete Floor – no EPA Suspect Materials located on the floor.***

Fiberglass

Wood

Glass

Metal

Plastic

Concrete

Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested:
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing  $>1.0\%$  Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive 'destructive' sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or



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If extensive 'destructive' sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.
5. Disturbance of these areas could create a potential health hazard.

### *Recommendations*

The Client has advised that **Building D** is a renovation with disturbance of the concrete slab only.

*As Regulated Asbestos Containing Materials were not discovered during this inspection, further action is not required.*

HERRON™ would recommend as a minimum Plan of Action:

1. Management Plan (not applicable should any Asbestos Spill Response Actions be required): a site specific Management Plan to include an Operations and Maintenance Program (O&M) which could effectively manage the material, dependent on the use of the structure, occupants, etc.

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
2. Asbestos Abatement Project Design (Plan of Action): coordinated with Owner should be developed in order to direct exact areas and quantities of removal for renovation or demolition purposes.
3. Asbestos Abatement (to facilitate demolition): coordinated with Client, should the material be required to be removed prior to renovation or demolition activity:
4. Asbestos Air Monitoring: of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/dust sampling, etc.
5. Demolition Notification: is required, i.e., prior to demolition (or demolition of a load bearing wall), the Colorado Department of Health and Environment requires that the building(s) be certified by the State Certified Asbestos Building Inspector as:

- a. not having any regulated asbestos existing anywhere in the building(s);



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- b. this document serves as a certified notification to the owner/operator of the facility and the demolition contractor;
  - i. the non-friable asbestos-containing building materials, i.e., window glazing and caulking, tar impregnated asphaltic roofing materials, floor tiles, mastics, etc. will be allowed to be demolished with the building provided that the proposed building demolition methods do not include explosives, sawing, grinding, abrading or blasting that will render the materials friable;
  - ii. any asbestos-containing material allowed to stay in the facility must remain non-friable during demolition.
- c. Once the Demolition Notification has been endorsed, the Owner/Contractor is to submit an original to the Colorado Department of Health and Environment, which then undergoes a ten (10) working day notification process, after which a Demolition Approval will be issued, to be posted at the project site during operations.
- d. After receipt of the CDPHE demolition approval and Building Department demolition permit, renovate or demolish the areas of the Building(s) inspected (recycling prohibited), in accordance with local, state, and/or federal regulations as indicated (only).
- e. The Owner has been advised of the soil regulations 6 CCR 1007-2, the Colorado Solid Waste Regulations- Asbestos and Asbestos Contaminated Soil. The demolition contractor is required to remove 'all' demolition building material debris from the project site. This would include all 'small' pieces of the structure.



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### ***Building E Conclusion***

Based on the information generated by this report, we conclude that the aforementioned property **does not contain Asbestos Containing Material(s) (ACM)** for purposes of a renovation.

In order to comply with local, state, and/or federal regulations, the following ACM, or assumed ACM will have to be removed if they will be affected by the renovation:

None detected.

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

***Concrete Floor – no EPA Suspect Materials located on the floor.***

Fiberglass

Wood

Glass

Metal

Plastic

Concrete

Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested:
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing >1.0% Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive 'destructive' sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or

If extensive 'destructive' sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these



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areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.
5. Disturbance of these areas could create a potential health hazard.

#### ***Recommendations***

The Client has advised that **Building E** is a **renovation with disturbance of the concrete slab only**.

***As Regulated Asbestos Containing Materials were not discovered during this inspection, further action is not required.***

HERRON™ would recommend as a minimum Plan of Action:

1. Management Plan (not applicable should any Asbestos Spill Response Actions be required): a site specific Management Plan to include an Operations and Maintenance Program (O&M) which could effectively manage the material, dependent on the use of the structure, occupants, etc.

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
2. Asbestos Abatement Project Design (Plan of Action): coordinated with Owner should be developed in order to direct exact areas and quantities of removal for renovation or demolition purposes.
3. Asbestos Abatement (to facilitate demolition): coordinated with Client, should the material be required to be removed prior to renovation or demolition activity:
4. Asbestos Air Monitoring: of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/dust sampling, etc.
5. Demolition Notification: is required, i.e., prior to demolition (or demolition of a load bearing wall), the Colorado Department of Health and Environment requires that the building(s) be certified by the State Certified Asbestos Building Inspector as:
  - a. not having any regulated asbestos existing anywhere in the building(s);
  - b. this document serves as a certified notification to the owner/operator of the facility and the demolition contractor;
    - i. the non-friable asbestos-containing building materials, i.e., window glazing and caulking, tar



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impregnated asphaltic roofing materials, floor tiles, mastics, etc. will be allowed to be demolished with the building provided that the proposed building demolition methods do not include explosives, sawing, grinding, abrading or blasting that will render the materials friable;

- ii. any asbestos-containing material allowed to stay in the facility must remain non-friable during demolition.
- c. Once the Demolition Notification has been endorsed, the Owner/Contractor is to submit an original to the Colorado Department of Health and Environment, which then undergoes a ten (10) working day notification process, after which a Demolition Approval will be issued, to be posted at the project site during operations.
- d. After receipt of the CDPHE demolition approval and Building Department demolition permit, renovate or demolish the areas of the Building(s) inspected (recycling prohibited), in accordance with local, state, and/or federal regulations as indicated (only).
- e. The Owner has been advised of the soil regulations 6 CCR 1007-2, the Colorado Solid Waste Regulations-Asbestos and Asbestos Contaminated Soil. The demolition contractor is required to remove 'all' demolition building material debris from the project site. This would include all 'small' pieces of the structure.



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### ***Building F Conclusion***

Based on the information generated by this report, we conclude that the aforementioned property **does not contain Asbestos Containing Material(s) (ACM)** for purposes of a **complete demolition by wrecking (recycling prohibited)**.

In order to comply with local, state, and/or federal regulations, the following ACM, or assumed ACM will have to be removed if they will be affected by the renovation:

None detected.

Suspect materials which were sampled and determined to contain  $\leq 1.0\%$  Asbestos (refer to Attachments), by PLM and/or PLM Point Count analysis are:

White Sprayed on Insulation, Surfacing Material (S), Friable, >5000 Square Feet, Good Condition (Current Condition), throughout Surface Interior Ceiling and Walls, 7 Sample(s),

022414-1A-F, Ceiling, 25' from W Wall, 5' from S Wall, Photo 090516

022414-1B-F, Ceiling, 25' from E Wall, 15' from N Wall, Photo 091923

022414-1C-F, E Wall, 15' from N Wall, 15' from Floor, Photo 091927

022414-1D-F, Ceiling, 35' from W Wall, 10' from S Wall, Photo 090911

022414-1E-F, S Wall, 30' from W Wall, 20' from Floor, Photo 090907

022414-1F-F, S Wall, 20' from E Wall, 15' from Floor, Photo 090520

022414-1G-F, N Wall, 20' from E Wall, 12' from Floor, Photo 091931

White Unfinished Drywall Walls, Miscellaneous Material (M), Non-Friable, <160 Square Feet, Good Condition (Current Condition), throughout Surface of North Wall, 1 Sample(s),

022414-2A-F, N Wall, 16' from S Wall, 4' from Floor, Photo 092444

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

Concrete  
Fiberglass  
Wood  
Glass  
Metal  
Plastic  
Concrete  
Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested:
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing  $>1.0\%$  Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be



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performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

## Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive ‘destructive’ sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or

If extensive ‘destructive’ sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.
5. Disturbance of these areas could create a potential health hazard.

## Recommendations

The Client has advised that **Building F** is a complete demolition by wrecking (recycling prohibited).

*As Regulated Asbestos Containing Materials were not discovered during this inspection, further action is not required.*

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
2. Asbestos Abatement Project Design (Plan of Action): coordinated with Owner should be developed in order to direct exact areas and quantities of removal for renovation or demolition purposes.
3. Asbestos Abatement (to facilitate demolition): coordinated with Client, should the material be required to be removed prior to renovation or demolition activity:
4. Asbestos Air Monitoring: of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/dust sampling, etc.



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5. Demolition Notification: is required, i.e., prior to demolition (or demolition of a load bearing wall), the Colorado Department of Health and Environment requires that the building(s) be certified by the State Certified Asbestos Building Inspector as:
- a. not having any regulated asbestos existing anywhere in the building(s);
  - b. this document serves as a certified notification to the owner/operator of the facility and the demolition contractor;
    - i. the non-friable asbestos-containing building materials, i.e., window glazing and caulking, tar impregnated asphaltic roofing materials, floor tiles, mastics, etc. will be allowed to be demolished with the building provided that the proposed building demolition methods do not include explosives, sawing, grinding, abrading or blasting that will render the materials friable;
    - ii. any asbestos-containing material allowed to stay in the facility must remain non-friable during demolition.
  - c. Once the Demolition Notification has been endorsed, the Owner/Contractor is to submit an original to the Colorado Department of Health and Environment, which then undergoes a ten (10) working day notification process, after which a Demolition Approval will be issued, to be posted at the project site during operations.
  - d. After receipt of the CDPHE demolition approval and Building Department demolition permit, renovate or demolish the areas of the Building(s) inspected (recycling prohibited), in accordance with local, state, and/or federal regulations as indicated (only).
  - e. The Owner has been advised of the soil regulations 6 CCR 1007-2, the Colorado Solid Waste Regulations- Asbestos and Asbestos Contaminated Soil. The demolition contractor is required to remove 'all' demolition building material debris from the project site. This would include all 'small' pieces of the structure.



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## Building G Conclusion

Based on the information generated by this report, we conclude that the aforementioned property **does contain Asbestos Containing Material(s) (ACM)** for purposes of a renovation.

Sample No.	Homogeneous Material Description	Approximate Quantity	AHERA Rating	Asbestos Laboratory Results	Layer/ Physical Description
	Black 12X12" Floor Tile on Concrete, Miscellaneous Material (M), Non-Friable, Good Condition (Current Condition), throughout Interior	>160 FT <sup>2</sup>	6		
022414-1A-G	On Floor in Break Room, 3' from N Wall, 1' from W Wall, Photo 095701, Sample 1 of 3			ND ND	A: Yellow adhesive B: White tile
022414-1B-G	On Floor in Hall, 2' from N Wall, 2' from E Wall, Photo 095709, Sample 2 of 3			ND 2.0% C	A: Black mastic B: Off white/green tile
022414-1C-G	On Floor in Women's Restroom, 5' from E Wall, 3' from S Wall, Photo 095719, Sample 3 of 3			ND 2.0% C	A: Black mastic B: Off white/green tile

<sup>1</sup>Quantification may not be within the scope of this inspection. <sup>2</sup>AHERA Rating based on current usage, however, may change dependent on the use of the property.

AHERA RATINGS			
Rating	Surfacing Material	TSI	Miscellaneous Material
1		Damaged or Significantly Damaged	
2	Damaged		
3	Significantly Damaged		
4			Damaged or Significantly Damaged
5	Good Condition with Potential for Damage	Good Condition with Potential for Damage	Good Condition with Potential for Damage
6	Good Condition with Potential for Significant Damage	Good Condition with Potential for Significant Damage	Good Condition with Potential for Significant Damage
7	Good Condition with Low Potential	Good Condition with Low Potential	Good Condition with Low Potential
<b>Asbestos Forms</b>			
C = Chrysotile			
A = Amosite			
TA = Tremolite-Actinolite			



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Materials that contain  $\leq 1.0\%$  Asbestos are not considered Asbestos Containing Materials by NESHAPS or EPA but may still be covered by OSHA. OSHA regulations may apply during potential disturbance activities.

Suspect materials which were sampled and determined to contain  $\leq 1.0\%$  Asbestos (refer to Attachments), by PLM and/or PLM Point Count analysis are:

None detected.

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

Fiberglass  
Wood  
Glass  
Metal  
Plastic  
Concrete  
Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested:
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing  $>1.0\%$  Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive 'destructive' sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or

If extensive 'destructive' sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.



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4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.

Disturbance of these areas could create a potential health hazard.

## *Recommendations*

The Client has advised that **Building G** is a **renovation with disturbance of the concrete slab only**.

As Regulated Asbestos Containing Materials were discovered during this inspection are in good condition, no further action is required, however, the materials should be managed and not disturbed.

HERRON™ would recommend as a minimum Plan of Action:

1. Management Plan (not applicable should any Asbestos Spill Response Actions be required): a site specific Management Plan to include an Operations and Maintenance Program (O&M) which could effectively manage the material, dependent on the use of the structure, occupants, etc.

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
2. Asbestos Abatement Project Design (Plan of Action): coordinated with Owner should be developed in order to direct exact areas and quantities of removal for renovation or demolition purposes.
3. Asbestos Abatement (to facilitate demolition): coordinated with Client, should the material be required to be removed prior to renovation or demolition activity:
4. Asbestos Air Monitoring: of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/dust sampling, etc.
5. Demolition Notification: is required, i.e., prior to demolition (or demolition of a load bearing wall), the Colorado Department of Health and Environment requires that the building(s) be certified by the State Certified Asbestos Building Inspector as:
  - a. not having any regulated asbestos existing anywhere in the building(s);
  - b. this document serves as a certified notification to the owner/operator of the facility and the demolition contractor;
    - i. the non-friable asbestos-containing building materials, i.e., window glazing and caulking, tar impregnated asphaltic roofing materials, floor tiles, mastics, etc. will be allowed to be demolished with the building provided that the proposed building demolition methods do not include



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explosives, sawing, grinding, abrading or blasting that will render the materials friable;

- ii. any asbestos-containing material allowed to stay in the facility must remain non-friable during demolition.
- c. Once the Demolition Notification has been endorsed, the Owner/Contractor is to submit an original to the Colorado Department of Health and Environment, which then undergoes a ten (10) working day notification process, after which a Demolition Approval will be issued, to be posted at the project site during operations.
- d. After receipt of the CDPHE demolition approval and Building Department demolition permit, renovate or demolish the areas of the Building(s) inspected (recycling prohibited), in accordance with local, state, and/or federal regulations as indicated (only).
- e. The Owner has been advised of the soil regulations 6 CCR 1007-2, the Colorado Solid Waste Regulations- Asbestos and Asbestos Contaminated Soil. The demolition contractor is required to remove 'all' demolition building material debris from the project site. This would include all 'small' pieces of the structure.



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### ***Building H Conclusion***

Based on the information generated by this report, we conclude that the aforementioned property **does not contain Asbestos Containing Material(s) (ACM)** for purposes of a renovation.

In order to comply with local, state, and/or federal regulations, the following ACM, or assumed ACM will have to be removed if they will be affected by the renovation:

None detected.

Suspect materials which were sampled and determined to contain  $\leq 1.0\%$  Asbestos (refer to Attachments), by PLM and/or PLM Point Count analysis are:

Gray 12X12" Floor Tile on Concrete, Miscellaneous Material (M), Non-Friable, <160 Square Feet, Good Condition (Current Condition), North East Corner Interior, 1 Sample(s),  
022414-1A-H, On Floor, 8' from N Wall, at Building I, Photo 095629

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

Fiberglass  
Wood  
Glass  
Metal  
Plastic  
Concrete  
Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested.
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing  $>1.0\%$  Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive 'destructive' sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or



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If extensive 'destructive' sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.
5. Disturbance of these areas could create a potential health hazard.

## *Recommendations*

The Client has advised that **Building H** is a **renovation with disturbance of the concrete slab only**.

*As Regulated Asbestos Containing Materials were not discovered during this inspection, further action is not required.*

HERRON™ would recommend as a minimum Plan of Action:

1. Management Plan (not applicable should any Asbestos Spill Response Actions be required): a site specific Management Plan to include an Operations and Maintenance Program (O&M) which could effectively manage the material, dependent on the use of the structure, occupants, etc.

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
2. Asbestos Abatement Project Design (Plan of Action): coordinated with Owner should be developed in order to direct exact areas and quantities of removal for renovation or demolition purposes.
3. Asbestos Abatement (to facilitate demolition): coordinated with Client, should the material be required to be removed prior to renovation or demolition activity:
4. Asbestos Air Monitoring: of project on behalf of Client, i.e., compliance to local, state, and/or federal regulations (as applicable), i.e., compliance, visual inspections, monitoring, air/dust sampling, etc.
5. Demolition Notification: is required, i.e., prior to demolition (or demolition of a load bearing wall), the Colorado Department of Health and Environment requires that the building(s) be certified by the State Certified Asbestos Building Inspector as:

- a. not having any regulated asbestos existing anywhere in the building(s);



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- b. this document serves as a certified notification to the owner/operator of the facility and the demolition contractor;
  - i. the non-friable asbestos-containing building materials, i.e., window glazing and caulking, tar impregnated asphaltic roofing materials, floor tiles, mastics, etc. will be allowed to be demolished with the building provided that the proposed building demolition methods do not include explosives, sawing, grinding, abrading or blasting that will render the materials friable;
  - ii. any asbestos-containing material allowed to stay in the facility must remain non-friable during demolition.
- c. Once the Demolition Notification has been endorsed, the Owner/Contractor is to submit an original to the Colorado Department of Health and Environment, which then undergoes a ten (10) working day notification process, after which a Demolition Approval will be issued, to be posted at the project site during operations.
- d. After receipt of the CDPHE demolition approval and Building Department demolition permit, renovate or demolish the areas of the Building(s) inspected (recycling prohibited), in accordance with local, state, and/or federal regulations as indicated (only).
- e. The Owner has been advised of the soil regulations 6 CCR 1007-2, the Colorado Solid Waste Regulations- Asbestos and Asbestos Contaminated Soil. The demolition contractor is required to remove 'all' demolition building material debris from the project site. This would include all 'small' pieces of the structure.



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### ***Building I Conclusion***

Based on the information generated by this report, we conclude that the aforementioned property **does not contain Asbestos Containing Material(s) (ACM)** for purposes of a renovation.

In order to comply with local, state, and/or federal regulations, the following ACM, or assumed ACM will have to be removed if they will be affected by the renovation:

None detected.

Suspect materials which were sampled and determined to contain  $\leq 1.0\%$  Asbestos (refer to Attachments), by PLM and/or PLM Point Count analysis are:

None detected

Suspect materials which were visually inspected and determined to be Non-ACM materials at the time of the inspection were:

***Concrete Floor – no EPA Suspect Materials located on the floor.***

Fiberglass  
Wood  
Glass  
Metal  
Plastic  
Concrete  
Etc.

Suspect materials which were not within the Scope of Work at the time of the inspection were:

1. All' EPA suspect Materials not requested.
2. 'Any' confirmed or suspect ACM which may have been concealed at the time of the inspection.
3. During a normal inspection, and more specifically when non-destructive sampling techniques are employed, it is not within the scope of the inspection to remove surface materials to inspect or quantify the structures and/or materials which may be under the surface, i.e., within or under concealed areas such as under carpet, under sub-floors, within chases, walls, crawlspaces, tunnels, etc., to remove suspect Asbestos Containing Material(s), to move and/or sample electrical wiring which has not been 'locked out', etc. All said areas are to be assumed as containing  $>1.0\%$  Asbestos, until such a time that these areas are made accessible, and/or rendered safe so that sampling can be performed. Prior to renovations or demolition of these areas, it is recommended that a more destructive protocol be utilized in order to make these determinations:

Concealed Materials –

Based on the nature of the Asbestos which could be concealed, it is recommended:

Extensive 'destructive' sampling and quantification of these materials throughout the property in order to determine if concealed locations contain an Asbestos or if isolated to a specific era of remodeling;

or



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If extensive 'destructive' sampling and quantification of these materials is not possible, and presumptions that concealed locations are potentially Asbestos, then it is recommended that a site specific Management Plan be developed and implemented which could effectively manage the future renovations of the property. A Management Plan can be designed to review specific locations of renovation locations, i.e., destructive sampling and quantification through concealed chases, and under carpeting prior to disturbance of these areas by the Owner or Contractors which will assist in the recognition and response to potential health risks from concealed Asbestos.

4. HERRON™ recommends extreme caution during a renovation or demolition of these areas in the event that an area which was not suspect, visible, accessible and/or specified during the inspection, is discovered to contain or is suspected of containing an Asbestos Containing Material (ACM). Under local, state and/or federal regulations, should such an event occur, the Client and or Contractor is required to cease operations which may effect this (these) material(s) until an inspection is concluded and a determination is made by an AHERA and State Certified Asbestos Building Inspector.
5. Disturbance of these areas could create a potential health hazard.

## *Recommendations*

The Client has advised that **Building I** is a **renovation with disturbance of the concrete slab only**.

*As Regulated Asbestos Containing Materials were not discovered during this inspection, further action is not required.*

HERRON™ would recommend as a minimum Plan of Action:

1. Management Plan (not applicable should any Asbestos Spill Response Actions be required): a site specific Management Plan to include an Operations and Maintenance Program (O&M) which could effectively manage the material, dependent on the use of the structure, occupants, etc.

Should a renovation or demolition occur which could affect concealed locations that are potentially Asbestos, HERRON™ would recommend as a minimum Plan of Action (where required):

1. Comprehensive Asbestos Building Inspection: a continuous process in areas which may not have been accessible, or for materials which may have been concealed in previous inspections, may be required, i.e., review and usage of previous Asbestos Inspection(s), identification of suspect materials, friable and non-friable, approximate quantities, discovery sampling in areas which will be affected by the renovation/demolition in order to determine the presence of Asbestos Containing Materials, etc.
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#### Inspection Methodology:

HERRON™ selected sample locations and frequency of sampling based on observations, Client requirements and/or the assumption that like materials in the same area are homogeneous in accordance with EPA Publication EPA 560 / 5-85 - 030a 'Asbestos in Buildings: Simplified Sampling Scheme'.

Sample locations and frequency of sampling of Walls and Ceilings are based on EPA 9/30/94 EPA Sampling Bulletin - ASBESTOS SAMPLING BULLETIN September 30, 1994 - Supplementary Guidance on Bulk Sample Collection and Analysis. Section V of this guidance bulletin offers a suggested strategy for distinguishing between joint compound found at joints in wallboard systems or when the material was applied as a skim coat; i.e., for determining whether "joint compound" has been applied as a "skim coat" over a wall surface (as referred to in the NESHAP Jan. 5, 1994 FR notice.)



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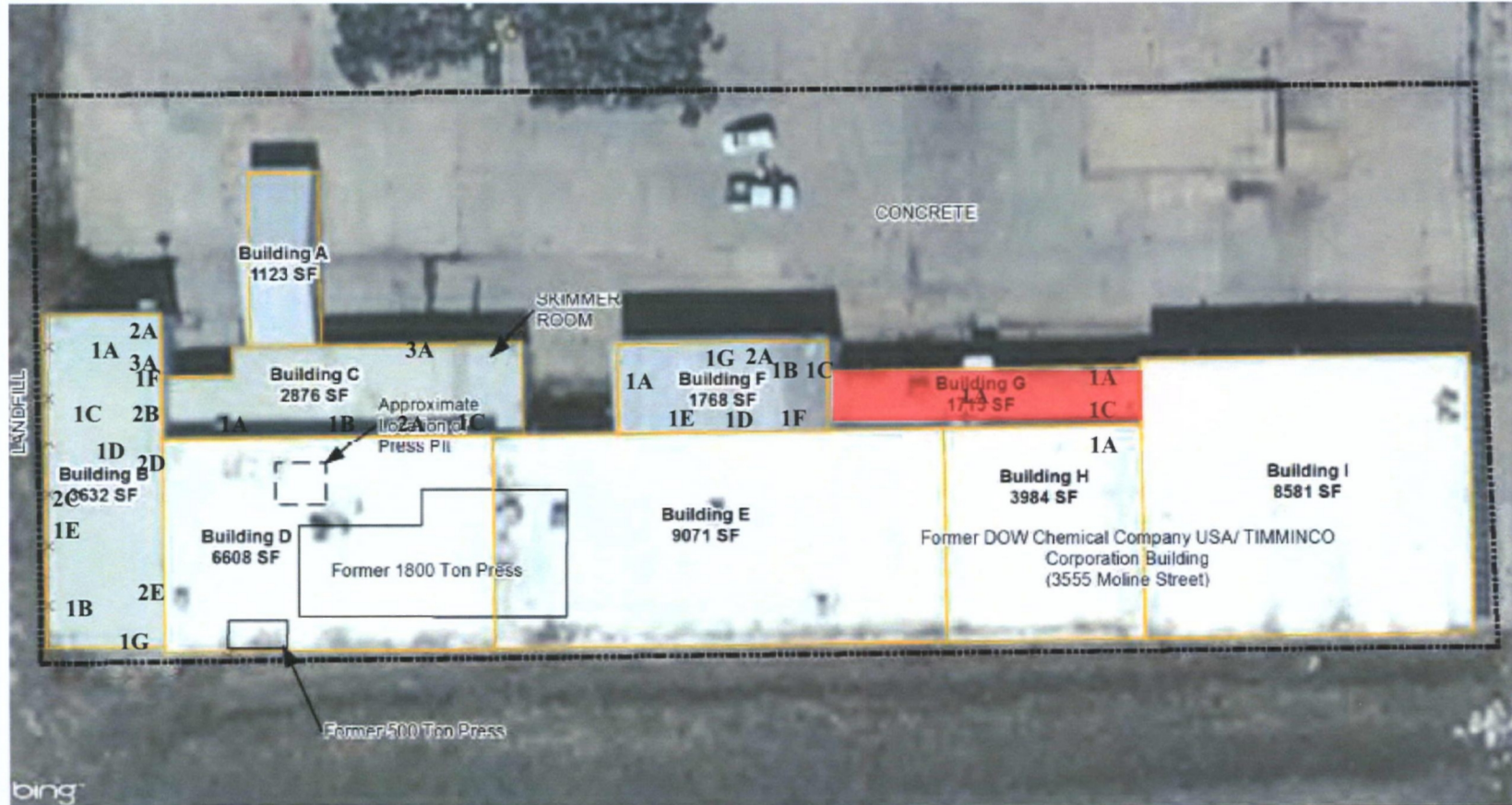
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Asbestos ( $\geq 1.0\%$ ) Floor Tile

Note: Plans copied by permission, not to scale. Approximate Sample and Asbestos Locations.